From: Hensley, Dave

To: <a href="mmajor@powerfulcompliance.com" "mmajor@powerfulcompliance.com" "mmajor@powerfulco

Subject: Hazard Analysis Formats

Date: Wednesday, March 15, 2017 10:28:00 AM

Attachments: PHA Example.pdf

Hi Mr. Major,

Attached please find a typical hazard analysis format. This format is very commonly used for both CAA Section 112(r)(1) "General Duty Clause" and 40 CFR Part 68, Chemical Accident Prevention Provisions "Risk Management Program" compliance. A specific format or method is <u>not</u> required. However, I think this format can be modified to use with any hazard analysis method and meet Big Ox's specific needs. The tables at the end are where the analysis is most unique per facility based on what equipment and chemicals are in use. Often facilities also use the safety data sheets (SDS) for the chemicals they produce, store, or handle for the hazard unique to the chemical substance. Big Ox did show us a SDS for the biogas/methane, however I did not see one for hydrogen sulfide.

Remember what needs done is to show compliance with CAA 112(r)(1). Specifically "to identify hazards which may result from (such) releases using appropriate hazard assessment techniques,".

Please feel free to contact me if you have any questions. I am in a training this afternoon 12 pm to 3 pm, but I will be as responsive as I can be.

Dave Hensley
Physical Scientist (Environmental)
Hensley.dave@epa.gov
Chemical & Oil Release Prevention (CORP)
Air & Waste Management Division
U.S. Environmental Protection Agency Region 7
11201 Renner Boulevard, Lenexa, KS 66219
913-551-7768